

Commonwealth of Kentucky
Division for Air Quality
COMMENTS AND RESPONSE
ON THE DRAFT PERMIT

Response to Comments

Comments on Cooper Standard Automotive Draft Title V Renewal Permit received from Dave Stamper, Health, Safety and Environmental Specialist.

General Comments

1. CSA requested a review of the limits located in Section B, page 2 of 22, #2, emission units 01, 02 & 03 (SN-1, SN-2 & SN-3-3) Three Indirect Heat Exchangers. CSA questioned why the particulate matter and sulfur dioxide emission limits differed from permit V-03-041 R3.

Division's response: *The Division acknowledges that there is no required change for the particulate emission limit and the change has been made. An error occurred in the initial calculation of sulfur dioxide emissions and was corrected in the proposed permit*

2. CSA requested the removal of PM testing located in Section B, page 6 of 22, #3 due to the lack of particulate emissions from these units.

Division's response: *Division concurs, and has removed the PM testing, and changed the unit specific testing to a source wide or facility wide testing for these units.*

3. CSA requested a change in language to reflect the use of Stoddard Solvent versus Adhesive in the Statement of Basis as well as in Section B, page 5 of 22, emission units 07 (SN-4, SN-5, SN-6, SN-7) -Off-line hose reinforcing operation and all Stoddard Solvent application operations.

Division's response: *Comment acknowledged, and the changes have been made.*

4. CSA requested that the words "printer station" be made plural, to reflect that there is more than one in the Statement of Basis and in Section B, page 7 of 22, emission units 23 (SN-23) - Hose Finishing Operations.

Division's response: *Comment acknowledged, and the change has been made.*